Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

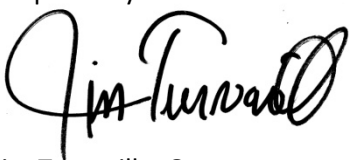
COMMENT:

TTS requests modification of Section 74.1201 to re-define "fill in area" to that which is allowed by the class of station, rather than the actual protected contour. That section states *"(h) Fill-in area. The area where the coverage contour of an FM translator or booster station is within the protected contour of the associated primary station (i.e., predicted 0.5 mV/m contour for commercial Class B stations, predicted 0.7 mV/m contour for commercial Class B1 stations, and predicted 1 mV/m contour for all other classes of stations)"*

Rather than utilizing the actual protected contour for fill-in translator or Booster operation, a use of the Class distance definitions is requested. As the Primary station has protection for a certain distance for its class of station, the fill-in area should include the entire area encompassed by the class of station regardless of the predicted contour of the station, as defined in 73.210(b). There are many circumstances where a station is not permitted to operate at full Class facilities, though they are fully protected by that distance. In those particular situations, the station's fill-in area would be equal to the predicated contour as if the station were licensed for the maximum power for its class.

A thorough review of this is hereby encouraged.

Respectfully Submitted



Jim Turvaville, Owner
Turbo Technical Services